

FILED  
Clerk  
District Court

FEB - 1 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**GEORGE L. HASSELBACK, ESQ.**  
**O'Connor Berman Dotts & Banes**  
**Second Floor, Nauru Building**  
**P.O. Box 501969**  
**Saipan, MP 96950**  
**Telephone No. (670) 234-5684**  
**Facsimile No. (670) 234-5683**

**Attorneys for Plaintiff Lisa Black**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**LISA BLACK,**

**Plaintiff,**

**vs.**

**JIM BREWER, individually and in his  
official capacity as Acting Principal for  
Hopwood Junior High School,  
COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS PUBLIC SCHOOL  
SYSTEM, and JOHN AND/OR JANE DOE,**

**Defendants.**

**CIVIL ACTION NO. 05-0038**

**PLAINTIFF'S CASE MANAGEMENT  
CONFERENCE STATEMENT**

Plaintiff, by and through counsel, and in accordance with Rule 16(b) and (c), Fed.R.Civ.Pro. and Local Rule 16(e)(2) hereby submits their Case Management Conference Statement.

**INTRODUCTION**

Through this action, Plaintiff seeks damages for wrongful termination and infringement of civil rights protected under the United States and Commonwealth Constitutions. This action involves only one Plaintiff, and seeks damages for front and back pay, contractual violations, emotional damages and attorneys fees.

**ORIGINAL**

**CASE MANAGEMENT STATEMENT**

(a) The various Defendants have been duly served.

(b) Plaintiff believes the Court has jurisdiction and the venue properly lies with this Court as well.

(c) Plaintiff believe this case should be assigned the Expedited Track but allow each party to call expert witnesses and conduct discovery according to the limits set forth in the Standard Track.

(d) Plaintiff anticipates she may file a Motion for Summary Judgment at the close of discovery.

(e) Plaintiff anticipates discovery will be necessary and requests that the parties be allowed the limit for discovery set forth in the Standard Tract.

(f) Plaintiff anticipates discovery can be accomplished within four months with a trial within six to nine months.

(g) Plaintiff does not anticipate the need for any special procedures except this case should be readily resolvable. Plaintiff therefore requests a settlement conference within the month of March 2006 before litigation costs impede the possibility of settlement.

(h) Plaintiff requests that the Expedited Track be modified to allow discovery and the potential testimony experts as outlined above.

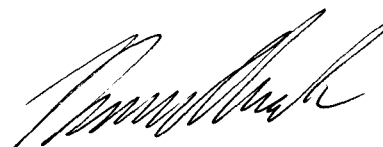
1 (i) Plaintiff is open to any reasonable settlement offer provided it truly is fair and  
2 made early enough to avoid expensive litigation costs.

3  
4 (j) This matter may be justly, efficiently and economically resolved if there is a  
5 settlement conference before litigation costs impede settlement prospects.

6  
7 (k) The Court should set dates convenient for the Court and all parties and as  
8 discussed in items (c), (e), (f) and (g).

9  
10 Dated: February 1, 2006

O'CONNOR BERMAN DOTTS & BANES  
Attorneys for Plaintiff Lisa Black

11  
12  
13  
14 By:   
15 GEORGE L. HASSELBACK  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28